



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 5, 2023

BY ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. 19 Duck Pond Lane, et al., 23 Civ. 1545 (JGLC)*

Dear Judge Clarke:

The Government writes, with the consent of the parties in the above-captioned matter, to provide additional information regarding the proposed discovery schedule in the Civil Case Management Plan and Scheduling Order, attached to this letter as Exhibit A. The parties are seeking an elongated discovery period for two reasons. First, the proposed schedule will allow time for a possible fugitive disentitlement motion. On August 25, 2023, the Government served special interrogatories on Medallion Inc. and Voxi Management Corp., pursuant to Rule G(6) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. The responses to those interrogatories may result in the Government filing a fugitive disentitlement motion, which could largely resolve the case. Second, the proposed schedule takes into account the large amount of likely discovery in this case, including both records and witnesses, located overseas. The parties can discuss both matters in greater detail at the September 13, 2023 initial pretrial conference.

Respectfully submitted,

DAMIAN WILLIAMS
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By: /s/
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